

EXHIBIT C

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

TASER INTERNATIONAL, INC., DAVID
BATCHELOR, NATALIE BATCHELOR, DR.
THOMAS COLLERTINE, JUDITH
COLLENTINE, CHARLES FAIRES, SANDRA
FAIRES, MASAJI KELLY, KELLY KELLEY,
STEPHEN LIENBY, PATRICIA LIENBY,
RICHARD D. ALMEROOTH, CONSTANCE L.
ALMEROOTH, JAMES BAKER, JR., ROBERT
BAKER, WILLIAM BURNSIDE, ESTATE OF
DOROTHYA. CONNELLY, SOUTHEAST EYE
SURGERY CLINIC, INC. EMPLOYEE PSP,
JAMES DUNAGIN, JR., EMILY DUNAGIN,
RICHARD C. HASKELL, SUSAN HASKELL,
RICHARD C. HASKELL, JR., AMY HASKELL,
MARY RICHARDSON, PAMELA LEWIS,
JANE MAJ, CRAIG W. MILLER, MARGARET
ROCHE, CHET SCOTT, JOHN SCOTT, PAULA
SCOTT, PETER SCOTT, MICHELLE SCOTT,
MARY ROSE STUCKER, DAVID ZEBER,
ANNE ZELTEN, MICHAEL BOYER, PHILLIPS
WALLER SMITH, PATRICK W. SMITH,
THOMAS P. SMITH and DEANNA M. SMITH,

JURY TRIAL DEMANDED

Civil Case No.
2008-EV-004739-B

Plaintiffs,

v.

MORGAN STANLEY & CO., INC., GOLDMAN,
SACHS & CO., GOLDMAN SACHS
EXECUTION & CLEARING, L.P., BEAR
STEARNS & CO, INC., K/N/A/ JP MORGAN
SECURITIES, INC., BEAR STEARNS
SECURITIES CORP., K/N/A JP MORGAN
CLEARING CORP., MERRILL LYNCH,
PIERCE, FENNER & SMITH, INC., DEUTSCHE
BANK SECURITIES, INC., CREDIT SUISSE
SECURITIES (USA) LLC, BANC OF AMERICA
SECURITIES, LLC, UBS SECURITIES, LLC and
JOHN DOES 1-10,

Defendants.

PLAINTIFFS' SECOND

REQUESTS FOR
PRODUCTION OF
DOCUMENTS TO EACH
DEFENDANT

Pursuant to O.C.G.A. § 9-11-26 and O.C.G.A. § 9-11-34, Plaintiffs hereby serve the following requests for production of documents, requesting that defendants Morgan Stanley & Co., Inc., Goldman Sachs Group, Inc., Bear Sterns Securities Corp., Merrill Lynch, Pierce, Fenner & Smith, Inc., Deutsche Bank Securities, Inc., Credit Suisse USA, Inc., Banc of America Securities, LLC and UBS Securities, LLC (collectively "Defendants"), produce the documents as herein requested and described for inspection and copying at the offices of Bondurant, Mixson & Elmore, 1201 W. Peachtree St., Suite 3900, Atlanta, Georgia 30309.

Definitions

1. "Defendants" shall mean. Morgan Stanley & Co., Inc., Goldman, Sachs & Co., Goldman Sachs Execution & Clearing L.P., Bear Sterns & Co., Inc., K/N/A JP Morgan Securities, Inc. Bear Sterns Securities Corp., Merrill Lynch, Pierce, Fenner & Smith, Inc., Deutsche Bank Securities, Inc., Credit Suisse Securities (USA) Inc., Banc of America Securities, LLC and UBS Securities, LLC, both individually and collectively, and includes any of their parents, subsidiaries, divisions, affiliates, predecessors, assigns, or successors, and any of their present or former officers, directors, trustees, employees, agents, representatives, attorneys and/or other persons acting on their behalf.

2. "TASER" shall mean Taser International, Inc., a company publicly traded on the NASDAQ stock market under the symbol TASR.

3. "Plaintiffs" shall mean the individuals identified as plaintiffs in the caption above, both individually and collectively.

4. "DTCC" shall mean the Depository Trust and Clearing Company, as well as its parents, subsidiaries, divisions, affiliates, predecessors, assigns, or successors, and any of its present or former liquidators, officers, directors, trustees, employees, agents, representatives, attorneys and/or other persons acting on its behalf. This specifically includes, but is not limited to, the National Securities Clearing Corporation.

5. "Security" or "Securities" mean any note, common stock, preferred stock, treasury stock, put, call, straddle, option, bond, debenture, evidence of indebtedness, transferable share, investment contract or, in general, any interest or instrument commonly known as a "security."

6. "Documents" means all writings and things of any nature by which information may be stored or communicated, including originals and all non-identical copies and drafts thereof, in your possession, custody, or control, regardless of where located, including without limitation contracts, agreements, memoranda, notes, correspondence, letters, e-mails, communications, telegrams, teletypes, telecopies, transmissions, messages

(including, but not limited to, records, reports, or memoranda of telephone calls and conversations), reports, studies, summaries, analyses, minutes, diaries, calendars, logs, notes, agenda, bulletins, notices, circulars, announcements, instructions, charts, tables, manuals, brochures, schedules, price lists, records, orders, invoices, statements, bills, books of account, ledgers, statistical, accounting, and financial statements, forecasts, work papers, notebooks, data sheets, translations, photographs, drawings, tape recordings, computer-stored information which can be retrieved or placed into reasonably usable form, written communications and written evidence of oral communications, and any other "document" from which information can be obtained or translated, if necessary, by you through detection devices into reasonably usable form. In all cases where originals and/or non-identical copies are not available, "documents" also means identical copies of original documents and copies of non-identical copies.

7. "And" as well as "or" shall be construed disjunctively or conjunctively so as to bring within the scope of each request all documents, writings, and things which might otherwise be construed to be outside its scope.

8. The use herein of the singular form of any noun or pronoun shall include, where appropriate, the plural thereof; the use herein of the

masculine gender shall include, where appropriate, the feminine.

9. The term "Person" as used herein shall mean an individual, corporation, partnership, or association, or any other business or governmental entity.

10. The terms "record", "reflect", "relate to", and "concern" are intended to have the broadest possible scope so that all documents, including drafts, are included if they in any way constitute, contain, pertain to, or mention the indicated subject or document. Whenever a document provides part, but less than all, of the information requested, such document should be produced along with all other related documents.

11. The term "communication" includes, but is not limited to, all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, conferences, interviews, telephone conversations, correspondence, notes, minutes, memoranda, telegrams, telexes, electronic mail messages, facsimiles, advertisements, or other forms of oral or written intercourse, however transmitted.

12. "Time Period" refers to January 1, 2002 to and through the present.

Instructions

1. Documents attached to other documents or materials shall not

be separated unless sufficient records are kept to permit reconstruction of the grouping or context in which the document is maintained in the ordinary course of your business.

2. If any document which you would have produced in response to any request was, but is no longer, in your present possession or subject to your control or is no longer in existence, please state whether any such document is: (1) missing or lost; (2) destroyed; (3) transferred to others; or (4) otherwise disposed of. In any such instance set forth the surrounding circumstances and any authorization for such disposition and state the approximate date of any such disposition, and, if known, state the present location and custodian of such document.

3. These document requests specifically seek electronic records (e.g., email, word processing documents, PowerPoints, Excel spreadsheets). Plaintiff shall produce all such records regardless of whether they are maintained or stored on an active, storage or archived system. Thus, these requests specifically include, but are not limited to, active, near-line and off-line electronic records, as well as electronic records stored on back-up tapes, floppy disc, compact disc, disaster tapes, magnetic tapes or any other medium used to store or archive email. These requests also specifically include "deleted" emails that can be retrieved. Finally, these requests seek

metadata.

4. Unless expressly stated otherwise, each of the document requests seeks documents from January 1, 2003, to the present.

5. If you contend that any document requested to be produced for inspection and copying is protected from disclosure by virtue of a privilege, provide the following with respect to each such document:

(a) The type of each such document (e.g., letter, memoranda, e-mail, telegram, telefax, notes, or memoranda of telephone conversations, etc.);

(b) The date of each such document;

(c) The author of each such document;

(d) The person to whom such document was directed;

(e) The person who received a copy of each such document;

and

(f) The general subject matter of each such document.

(g) With respect to each document which you claim is protected from disclosure by virtue of a privilege, as provided for in the foregoing instruction, it is requested that you shall provide as part of such description thereof:

(h) Each privilege whereby you contend the contents of such

document are protected from disclosure; and

(i) Each and every fact upon which you rely to support such claim.

Requests for Production

1.

“Each compliance, supervisory, and procedures manual, including any updates, modifications, and revisions to the manual, describing the policies and practices of [defendant] with respect to compliance with applicable laws and rules.” 17 C.F.R. § 240.17a-4(e)(7).

2.

Please provide documents sufficient to show each self-regulatory organization(s) of which the Defendants are members.

3.

“Each report which a securities regulatory authority has requested or required the [defendant] to make and furnish to it pursuant to an order or settlement” that involves or pertains to short selling, fails to deliver or TASER stock. 17 CFR § 240.17a-4(e)(6).

4.

“[E]ach securities regulatory examination report” that involves or pertains to short selling, fails to deliver or TASER stock. 17 CFR § 240.17a-4(e)(6).

5.

Please provide any minutes, notes or any other documents made in preparation for, memorializing, discussing or referencing communications, discussions and/or meetings any Defendant had with a regulatory agency, including the Securities and Exchange Commission, involving naked short selling or TASER stock. This request includes, but is not limited to, documents relating to meetings with the SEC relating to: (a) any amendments to Reg SHO; (b) naked short selling; (c) the “Naked” Short Selling Antifraud Rule (*see <http://www.sec.gov/rules/final/2008/34-58774.pdf>*); or (d) any Emergency Order by the SEC relating to short selling of any of the Defendants’ stock, including, but not limited to, SEC Release No. 34-58166, SEC Release No. 34-58190 and SEC Release No. 34-58572.

6.

Please produce all documents provided to any testifying expert witness and any document otherwise known to, used by, or available to such

witness in connection with that witness' role in this case or which forms any part of the basis of any opinion to which such expert is expected to testify.

7.

Please produce all documents you have received from third parties for purposes of or use in this litigation.

8.

Please provide all stock loan availability lists created by or for any Defendant.

9.

Please provide a listing of securities for which any Defendant has provided a reduced stock loan rebate rate for short positions.

10.

Please provide all daily Security Position Listing reports which reflect each daily closing balance in TASER securities for each Defendant that is a DTCC market participant.

11.

Please provide all documents evidencing the accounting of trades and settlement of trades in TASER securities provided to Defendants by the DTCC through the Continuous Net Settlement System, the Balance Order System, the Break and Inquiry Tracking System, Clearance Security Master

Files, or otherwise, including, without limitation, CNS Accounting Summary Sheets, Daily Reconciliation Clearing Sheets and Daily Participant Position Reports including sub account activity.

12.

Please provide all stock locate reports involving TASER securities created by or for any Defendant.

13.

All documents sent to or received from the NYSE, NASDAQ, SEC or any other security regulator in connection with Exchange Hearing Panel Decision 05-159 and the complaints and/or investigation underlying that decision.

14.

All documents discussing, referencing or relating to Exchange Hearing Panel Decision 05-159 and the complaints and investigation underlying that decision.

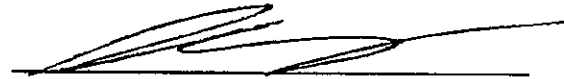
15.

Documents sufficient to show each Defendants' document retention policies, practices and procedures, including, but not limited to, any litigation holds put on place for purposes of this litigation.

16.

All documents discussing the potential impact or effect of: (a) any amendments to Reg SHO; (b) abusive naked short selling; (c) the "Naked" Short Selling Antifraud Rule (*see <http://www.sec.gov/rules/final/2008/34-58774.pdf>*); or (d) any Emergency Order by the SEC relating to short selling of any of the Defendants' stock, including, but not limited to, SEC Release No. 34-58166, SEC Release No. 34-58190 and SEC Release No. 34-58572.

Respectfully submitted this 18th day of June, 2009.



John E. Floyd
Georgia Bar No. 266413
Steven J. Rosenwasser
Georgia Bar No. 614908
Nicole G. Iannarone
Georgia Bar No. 382510
Bondurant, Mixson & Elmore, LLP
3900 One Atlantic Center
1201 West Peachtree Street, N.W.
Atlanta, Georgia 30309-3417
(404) 881-4100 Tel.
(404) 881-4111 Fax

James W. Christian
State Bar No. 04228700
Gary M. Jewell
State Bar No. 10664800
Scott R. Link
State Bar No. 12390900
Christian, Smith, & Jewell, LLP
2302 Fannin, Suite 500
Houston, Texas 77002
(713) 659-7617 Tel.
(713) 659-7641 Fax
(admitted pro hac vice)

John O'Quinn
State Bar No. 15296000
The O'Quinn Law Firm
440 Louisiana Street, Suite 2300
Houston, Texas 77002
(713) 223-1000 Tel.
(713) 222-6903 Fax
(pro hac application to be filed)

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June, 2009, true and correct copies of the foregoing **PLAINTIFFS' SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS TO EACH DEFENDANT** were served upon the following counsel of record via U.S. Mail delivery:

Attorneys for Defendants:

Richard H. Sinkfield, Esq.
Rogers & Hardin
2700 International Tower, Peachtree Center
229 Peachtree Street, N.E.
Atlanta, GA 30303-1601

Attorneys for Banc of America Securities, LLC:

Andrew J. Frackman, Esq.
Benjamin D. Petrosky, Esq.
Brendan J. Dowd, Esq.
O'Melveny & Myers LLP
7 Times Square
New York, NY 10036

Attorneys for Morgan Stanley & Co. Incorporated:

Robert F. Wise, Jr., Esq.
William J. Fenrich, Esq.
David B. Steinberg, Esq.
Melissa T. Aoyagi, Esq.
Davis Polk & Wardwell
450 Lexington Avenue
New York, NY 10017

Attorneys for Bear Stearns:

Stephen L. Ratner, Esq.
Harry Frischer, Esq.
Brian L. Friedman, Esq.
Proskauer Rose LLP
1585 Broadway
New York, NY 10036

Attorneys for The Goldman Sachs Group, Inc.:

Richard C. Pepperman II, Esq.
Richard H. Klapper, Esq.
Tracy Richelle High, Esq.
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004

Attorneys for Deutsche Bank Securities Inc.:

Heather L. Fesnak, Esq.
Peter J. Isajiw, Esq.
Gregory A. Markel, Esq.
Martin L. Seidel, Esq.
Cadwalader Wickersham & Taft LLP
One World Financial Center
New York, NY 10281

Attorneys for UBS Securities, LLC:

Andrew B. Clubok, Esq.
Emily P. Hughes, Esq.
Jeffrey G. Landis, Esq.
Kirkland & Ellis LLP
655 Fifteenth Street, N.W., Suite 1200
Washington, DC 20005-5793

Maria Ginzburg, Esq.
Kirkland & Ellis LLP
Citigroup Center
153 East 53rd Street
New York, NY 10022-4611

Attorneys for Credit Suisse USA, Inc.:

Fraser L. Hunter, Jr., Esq.
Wilmer Cutler Pickering Hale & Dorr LLP
399 Park Avenue
New York, NY 10022

Ryan P. Phair, Esq.
Wilmer Cutler Pickering Hale & Dorr LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006

Attorneys for Merrill Lynch, Pierce, Fenner & Smith, Inc.:

Paul M. Eckles, Esq.
Shepard Goldfein, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
4 Times Square
New York, NY 10036

This 18th day of June, 2009.



Steven J. Rosenwasser
Georgia Bar No. 614908

BONDURANT, MIXSON & ELMORE, LLP
3900 One Atlantic Center
1201 West Peachtree Street, N.W.
Atlanta, GA 30309-3417
Telephone (404) 881-4100
Facsimile (404) 881-4111

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

| | | |
|-----------------------------|---|----------------------------|
| TASER INTERNATIONAL, INC., | : | |
| <i>et al.</i> , | : | |
| | : | |
| Plaintiffs, | : | CIVIL ACTION |
| | : | FILE NO.: 2008-EV-004739-B |
| v. | : | |
| | : | |
| MORGAN STANLEY & CO., INC., | : | JURY TRIAL DEMANDED |
| <i>et al.</i> , | : | |
| | : | |
| Defendants. | : | |

CERTIFICATE OF SERVICE OF DISCOVERY

This is to certify that on this day the PLAINTIFFS' SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS TO EACH DEFENDANT were served upon counsel of record via U.S. Mail delivery in accordance with the certificate of service attached thereto.

Respectfully submitted this 18th day of June, 2009.

/s/ Steven J. Rosenwasser
John E. Floyd
Georgia Bar No. 266413
Steven J. Rosenwasser
Georgia Bar No. 614908
Nicole G. Iannarone
Georgia Bar No. 382510
Bondurant, Mixson & Elmore, LLP
3900 One Atlantic Center
1201 West Peachtree Street, N.W.
Atlanta, Georgia 30309-3417
(404) 881-4100 Tel.
(404) 881-4111 Fax

James W. Christian
State Bar No. 04228700
Gary M. Jewell
State Bar No. 10664800
Scott R. Link
State Bar No. 12390900
Christian, Smith, & Jewell, LLP
2302 Fannin, Suite 500
Houston, Texas 77002
(713) 659-7617 Tel.
(713) 659-7641 Fax
(admitted pro hac vice)

John O'Quinn
State Bar No.15296000
The O'Quinn Law Firm
440 Louisiana Street, Suite 2300
Houston, Texas 77002
(713) 223-1000 Tel.
(713) 222-6903 Fax
(pro hac application to be filed)

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June, 2009, a true and correct copy of the foregoing **CERTIFICATE OF SERVICE OF DISCOVERY** was electronically filed with the Clerk of Court using the Court's electronic filing system which will automatically send an email notification of such filing to the following attorneys of record who are registered participants in the Court's electronic notice and filing system:

Attorneys for Defendants:

Richard H. Sinkfield, Esq.
Rogers & Hardin
2700 International Tower, Peachtree Center
229 Peachtree Street, N.E.
Atlanta, GA 30303-1601

Attorneys for Banc of America Securities, LLC:

Andrew J. Frackman, Esq.
Benjamin D. Petrosky, Esq.
Brendan J. Dowd, Esq.
O'Melveny & Myers LLP
7 Times Square
New York, NY 10036

Attorneys for Morgan Stanley & Co. Incorporated:

Robert F. Wise, Jr., Esq.
William J. Fenrich, Esq.
David B. Steinberg, Esq.
Melissa T. Aoyagi, Esq.
Davis Polk & Wardwell
450 Lexington Avenue
New York, NY 10017

Attorneys for Bear Stearns:

Stephen L. Ratner, Esq.
Harry Frischer, Esq.
Brian L. Friedman, Esq.
Proskauer Rose LLP
1585 Broadway
New York, NY 10036

Attorneys for The Goldman Sachs Group, Inc.:

Richard C. Pepperman II, Esq.
Richard H. Klapper, Esq.
Tracy Richelle High, Esq.
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004

Attorneys for Deutsche Bank Securities Inc.:

Heather L. Fesnak, Esq.
Peter J. Isajiw, Esq.
Gregory A. Markel, Esq.
Martin L. Seidel, Esq.
Cadwalader Wickersham & Taft LLP
One World Financial Center
New York, NY 10281

Attorneys for UBS Securities, LLC:

Andrew B. Clubok, Esq.
Emily P. Hughes, Esq.
Jeffrey G. Landis, Esq.
Kirkland & Ellis LLP
655 Fifteenth Street, N.W., Suite 1200
Washington, DC 20005-5793

Maria Ginzburg, Esq.
Kirkland & Ellis LLP
Citigroup Center
153 East 53rd Street
New York, NY 10022-4611

Attorneys for Credit Suisse USA, Inc.:

Fraser L. Hunter, Jr., Esq.
Wilmer Cutler Pickering Hale & Dorr LLP
399 Park Avenue
New York, NY 10022

Ryan P. Phair, Esq.
Wilmer Cutler Pickering Hale & Dorr LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006

Attorneys for Merrill Lynch, Pierce, Fenner & Smith, Inc.:

Paul M. Eckles, Esq.
Shepard Goldfein, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
4 Times Square
New York, NY 10036

This 18th day of June, 2009.

/s/ Steven J. Rosenwasser

Steven J. Rosenwasser
Georgia Bar No. 614908

BONDURANT, MIXSON & ELMORE, LLP
3900 One Atlantic Center
1201 West Peachtree Street, N.W.
Atlanta, GA 30309-3417
Telephone (404) 881-4100
Facsimile (404) 881-4111